Fill in this information to identify the case:

Debtor 1 Thomas G. McKnight

Debtor 2 (Spouse, if filing) Marie McKnight

United States Bankruptcy Court for the: Eastern District of Pennsylvania (State)

Case number 19-15133-amc

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: Wells Fargo Bank, N.A.

Court claim no. (if known): 5

Last 4 digits of any number you use to identify the debtor's account: 4 7 8 3

Property address:
2839 SOUTH SYDENHAM STREET
Number Street

PHILADELPHIA PA 19145
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

☑ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: $ ________

Part 3: Postpetition Mortgage Payment

Check one:

☑ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 10 / 20 / 2024 (MM / DD / YYYY)

☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) $ ________

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) $ ________

c. **Total.** Add lines a and b. (c) $ 0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: ____/____/______ (MM / DD / YYYY)

Debtor 1 Thomas G. McKnight
First Name Middle Name Last Name

Case number (*if known*) 19-15133-amc

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

☐ I am the creditor.

☑ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

✘ /s/ Michelle L. McGowan
Signature

Date 10 / 08 / 2024

Print Michelle L. McGowan
First Name Middle Name Last Name

Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 13010 Morris Road, Suite 450
Number Street

Alpharetta, GA 30004
City State ZIP Code

Contact phone (470) 321 – 7112

Email mimcgowan@raslg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October __9__, 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Thomas G. McKnight
2839 South Sydenham Street
Philadelphia, PA 19145

Marie McKnight
2839 South Sydenham Street
Philadelphia, PA 19145

And via electronic mail to:

Michael A. Cibik
1500 Walnut Street
Suite 900
Philadelphia, PA 19102

Trustee
Scott F. Waterman [Chapter 13]
Chapter 13 Trustee
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606

U.S. Trustee
United States Trustee
Office of the U.S. Trustee
Robert N.C. Nix Federal Building
Suite 320
Philadelphia, PA 19107

By: /s/ Long-Giang Nguyen

Email: petnguyen@raslg.com